

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

RECEIVEDJAN 23 2019 *PS*THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Reina Lopez

)
)
)
)Plaintiff(s),

)
)1:19-cv-00485
Judge John J. Tharp, Jrv. Walgreens

)
)

Magistrate Judge Sunil R. Harjani

Defendant(s).

)

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is Reina Lopez of the
county of _____ in the state of _____.3. The defendant is Walgreens, whose
street address is 104 Wilmot Rd., MS # 144 W,
(city) Deerfield (county) _____ (state) IL (ZIP) 60015

(Defendant's telephone number) (____)-_____

4. The plaintiff sought employment or was employed by the defendant at (street address)

841 Bloomington Rd (city) Champaign
(county) Champaign (state) IL (ZIP code) 61820

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5. The plaintiff [*check one box*]

- (a) was denied employment by the defendant.
- (b) was hired and is still employed by the defendant.
- (c) was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,
(month) September, (day) 11, (year) 2017.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

- (a) The defendant is not a federal governmental agency, and the plaintiff
[*check one box*] *has* *has not* filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:
 - (i) the United States Equal Employment Opportunity Commission, on or about
(month) August (day) 23 (year) 2018.
 - (ii) the Illinois Department of Human Rights, on or about
(month) May (day) 9 (year) 2018.
- (b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. Yes, No, **but plaintiff will file a copy of the charge within 14 days.**
I can't get a copy of the charge from EEOC public portal due to government shutdown.
It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

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defendant asserting the acts of discrimination indicated in this court complaint.

Yes (month) _____ (day) _____ (year) _____

No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month) _____
(day) _____ (year) _____.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

Yes No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

Yes N0, but a copy will be filed within 14 days.

8. (*Complete paragraph 8 only if defendant is not a federal governmental agency.*)

(a) the United States Equal Employment Opportunity Commission has not
issued a *Notice of Right to Sue*.

(b) the United States Equal Employment Opportunity Commission has issued
a *Notice of Right to Sue*, which was received by the plaintiff on
(month) _____ (day) _____ (year) _____ a copy of which
I can't check the exact date
Notice is attached to this complaint. *because for the government shutdown*
I can't open the EEOC public portal.

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

(a) Age (Age Discrimination Employment Act).

(b) Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

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- (c) Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) Religion (Title VII of the Civil Rights Act of 1964)
- (g) Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the ADA by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791; and for the ADEA, 29 U.S.C. § 626(c).
12. The defendant [*check only those that apply*]
- (a) failed to hire the plaintiff.
- (b) terminated the plaintiff's employment.
- (c) failed to promote the plaintiff.
- (d) failed to reasonably accommodate the plaintiff's religion.
- (e) failed to reasonably accommodate the plaintiff's disabilities.
- (f) failed to stop harassment;
- (g) retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) other (specify): failed to protect Human Rights

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13. The facts supporting the plaintiff's claim of discrimination are as follows:

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.
15. The plaintiff demands that the case be tried by a jury. Yes No (*Not for sure*)
16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff
[check only those that apply]
- (a) Direct the defendant to hire the plaintiff.
- (b) Direct the defendant to re-employ the plaintiff.
- (c) Direct the defendant to promote the plaintiff.
- (d) Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f) Direct the defendant to (specify): *tell all the truth*
to whole nation that was harassment
and public humiliation.

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- (g) If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) Grant such other relief as the Court may find appropriate.

Reina Lopez
(Plaintiff's signature)

Reina Lopez
(Plaintiff's name)

354-204 Shimominada Saijo cho
(Plaintiff's street address)

Higashi Hiroshima
(City) Hiroshima (State) Japan (ZIP) 739-0023

(Plaintiff's telephone number) (011)-81-82-426-0419

Date: 01/12/2019

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

United States District Court
Northern District of Illinois

Reina Lopez
Plaintiff

V

Walgreens
Defendant

COMPLAINT

Dear Honor,

I was told that there's no cause finding by EEOC. I still would like to file a case against Walgreens, because I know there's cause. I do not have attorney. I do not have any witness and/or evidence I can provide, because no one is willing to help me and tell me the truth.

I understand that it is not going to be easy for me, because of lack of evidence, however, I have to stand up for myself and for my human rights. And I'll telling the truth as you know.

I believe my previous boss at Walgreens, and there might be U.S government involved on this case, they made a video saying I'm criminal and bad person, and also made a video to make me embarrassed, and sent it to whole nation.

After this, people around me reacted to look scare at me, and/or laugh at me, and/or laugh at me. All my friends and people I know did not talk to me anymore. I was harassed by all the people in the United States.

After I said I`m depressed, my boss Tommy told me he wants me, because they care about me. But, they didn`t look like so. They looked, and sounded like they were acting funny.

It was around July and August 2017, I was having bad headaches. I have a brain injury. My headaches was tense, and I went to Chiropractic. I also went to see a doctor, but none of medications worked for me, so someone told me to try Chiropractic. After he adjusted my neck at Chiropractic, I started to have bad neck pain. I went to ER, and the doctor told me he is going to take a CT scan with contrast. They gave me IV. Short after, I started to feel like just want to get up and walk around. The condition kept going, and I felt like I want to walk around , and move around even on a bus and at work.

On the same time, I was feeling a lot of anxiety, and felt like depress. It`s kind of hard to describe how exactly I was feeling, but I could never feel happy like I used to. I thought I was depressed. However, I couldn`t find any reasons to be depressed, so that was the one reason, I did not sign the paper my boss told me to.

My physical state, feeling like I want to walk around, and move around, when I got back in Japan, doctor told me it was side effect from medication, probably from the CT contrast medium, it`s called “Akathisia.”

After I got this symptom, I stated to make mistakes. I do not know why, but I said something wrong to customers couple times.

So, I was thinking, because I said something wrong, my boss decided to say something about me? Such as I`m criminal and/or bad person?

I do not know why. I`m still not understanding why they could have done such as cruel thing to me. I understand that making mistakes at work is not good thing, however, I`ve never ever made mistakes intentionally.

I asked people why they are angry, why they were laughing at me, but no one told me the truth. Even investigator told me they could not find any evidence which they know everything.

I do not understand what law in the U.S is anymore. I do not think law exist in the country.

What they has done to me is a crime. They called me I`m criminal, but I`ve never committed crime. They are criminals. They are bad people.

I wanted to ask you, Judge, if you really believe in God, and swear to God to tell the truth at court, if you are following the law, and have a heart, kindness and compassion, please do so.

Every day, I have to be aware of people around me. I have to see how they react on me. I`m afraid of my daily life and future. Thinking why, and having all the pain and sadness. Feeling like I do not deserve to live.

I had so many times wish to be disappear, and hate to live.

I am one Human Bing..

Kids at school, they often get bullied, and sometimes they commit suicide. Those kids who were bullying, and made them to commit suicide, I think they are guilty. I think bullying is against law. I think harassment is also against law.

When I reached out to Illinois Department of Human Rights, The investigator told me "That was a harassment."

I pretty much lost the faith. Faith to God. If God exist here in this world, he would have never done anything like this to me, so I

conclude probably, God does not exist. Even so, I still pray to God, cry for help.

I hope he hear my voice.

So, one day, if he hear my voice, I want all the people in the U.S know I`m not criminal and/or bad person. I`ve never done anything to be humiliated myself, so I want them to know all the truth.

I want people to stop harass and laugh at me.

I want to live life normal as before.

I hope someday, go back to U.S, and talk to my friends as friend.

Sincerely,

Reina Lopez

Reina Lopez

354-204 Shimominaga Saijo Cho Higashi Hiroshima

Hiroshima Ken, Japan

011-81-82-426-0419

To whom it may concern,

Hello. My name is Reina Lopez. Please give me an opportunity to talk to you today.

I apologize for my English writing skills.

I used to work at Walgreens in Champaign, IL. I believe whole nation received Alert text message saying I`m criminal and/or more, so people around me started to get angry at me and/or laugh at me and/or scare at me after Sep 11th,2017.

Back on 2012, I got a brain injury, so I always have headaches. Sometimes the headaches get intense. I started to have real bad headaches from around July 2017. I tried all different kind of pain medication, but nothing really worked for me. Someone told me to try Oriental Medicine, so I went to Chiropractic. After he adjusted my neck, I started to have more headaches and neck pain. One day, I went to ER for the pain. The doctor told me he is going to take a CT scan with Contrast. They gave me an IV. I think it`s called Contrast Medium. Couple minutes later, technician came to pick me up for take a CT scan. He told me to lay on the bed, but it was really hard to lay and stay on the bed. I`m not for sure how exactly describe the feeling, but I just wanted to get up from bed, and walk around. I didn`t know what was going myself, but later, when I came back to Japan, I talked about that to my doctor. He told me it`s side effect from the medicine, it`s called “Akathisia.”

The feeling continued even after the day. When I was on a bus, it was hard to sit and still for me. I just wanted to get up and walk around. It was also hard to stand and stay at register at work for me. I just wanted to leave from there, and walk around and move around. I had a feeling that I shouldn`t be working, but I kept going to work, and started to make a lot of mistakes at work.

One day, one customer came to me, and asked me something. I don`t know why, but I told him something wrong. I really don`t

know why I said so, but I just wanted to leave from register quickly, because I still had the symptom. (I couldn't stay and still.) I was feeling like restless and kind of irritating feeling.

Another day, one regular customer came, and asked me to get a cigarettes from behind the counter. I usually know which cigarettes and where it is, but couple minutes before, my coworker reset the place, so I had no idea where the cigarettes was located. I called my manager, and asked him where the cigarettes, because there were four or five customers were waiting at register, and I didn't want make them to wait so long. I thought that was best thing to do, but people started to laugh at me.

Another day, one guy came and asked me to put some money on his prepaid card. He looked like same guy came and put a lot of money earlier on that day, so I told him I can't put any money anymore, because one customer can put money only up to \$500.00 per day. But, I guess he was not the same guy I thought. He started to get upset, so I called my manager.

One day, one lady came and asked me if we carry key chain. I immediately thought I don't think we carry that, but sometimes we get souvenir from Chicago area, so I thought maybe we have somewhere, so I called my coworker and tried to make sure.

I know I was making a lot of mistakes, but nothing intentionally. I regret that I didn't take off, because now I know, I wasn't condition I could perform well with Akathisia symptom. I was feeling terrible about making a lot of mistakes.

I was married back from 2007 to 2011. I was married to service guy. I was in domestic violence situation, so Military used to separate us by protection order. I was at home by myself every day. I didn't have a car, I didn't have a lot of friends, I didn't have a job, I didn't even speak English well. I spent most of days at empty house alone. I was too lonely, and I started to have panic anxiety when I was alone, I started to have trouble breathing, emptiness. I was feeling like I was the only one human Bing on the planet. That condition kept happening even after divorce, but I was trying

to manage it by keeping busy always. However, the anxiety came back from July. Besides, I was feeling like sick, I didn't have energy I want to do anything. Nothing I ate taste good... I was having a lot of pain, headaches and neck pain, so I thought maybe that is because I'm depression, so I told my manager I was depression.

One day, my boss told me we have to move stuff from one side to the other side of shelf. I did not know how to, or where we need to move, so I was asking to my manager where I needed to move. When she was helping customers, I did not know what to do, so I was just standing. I did not notice customers were coming to register, so I guess my coworker Steve had to come to register. Maybe that's why Steve was angry. He looked angry at me. After I came back from break, I was standing at register. I started to feel nausea, and I told my manager Katy "I don` feel good." She made uncomfortable face. I told her "Steve is mad", and I little cried. My manager Katy seemed angry, and Steve was angry too, so that was in my mind, so I said "Steve is mad." but, I guess that made my manager Katy and Steve embarrassed, they started to get angry. I didn't mean to make them embarrassed at all. I heard they were yelling at back room. I realized they were really angry, so I was going to apologize. I asked them if they were angry at me, but they said no. They said they are not angry even not slightly.

The next day, my store manager called me at office. I thought he was going to tell me my word made my manager and coworker embarrassed, but instead, he told me I`m doing fantastic job... He looked over exaggerated. I felt that was kind of weird...

Couple days later, my store manager gave me a paper. He told me it is a program Walgreen has, and told me to sign the paper. They wanted me to go to psychiatrist and counseling. However, I refused to do so, because I've already went to see my psychiatrist. Couple weeks before, my manager told me she saw my Facebook. I got scared, because I was putting some pictures from salsa. I used to go to dance salsa on Saturday night, because I love dancing and

that was only my joy I had. But, I lied to my work. I asked let me leave earlier on Saturday night. I couldn't say I go to dance at club, so I told them I go to salsa class.

So, when my manager told me she saw my Facebook, I got scared. I went to see my psychiatrist, and asked him how I should do about that. That's why, I didn't want to go back to see my psychiatrist, because I thought it's going to be really rude for my psychiatrist.

I was also thinking they were trying to put me at psychiatric hospital. When I was married, I used to see counselor for domestic violence situation. I was separate from my husband, I was so alone, and depressed. One day I told my counselor I want to die... She sent me to ER, and I was sent to psychiatric hospital from there. At hospital, they told me to sign a paper. I didn't even know what exactly it was, but I signed it. Being at psychiatric hospital, it was really scary event for me. I regretted sign on the paper...

I was traumatized at the event, so when they told me to sign the paper going through both of psychiatrist and counselor, I totally thought they are trying to put me at psychiatric hospital. Because I knew I was behaving weird. I was always walk around and move around from Akathisia symptom..

And also, I didn't have clear reason to explain about depression. Maybe I wasn't depressed. I was having anxiety, so I just thought I was depressed... Later, I was reading article about Akathisia, and one of those symptom had anxiety.

But, there's nothing to do with I said Steve is mad. I have no idea why I said myself neither, but I had no intention to make them feel bad...

But, I don't understand.. It's because I made Katy and Steve embarrassed, so they wanted to make a video to make me embarrassed? It's because they were angry at me, so they wanted to make a video which whole nation make me angry, and sent it to whole nation?

When I was kid, I was always bullied. I didn't know how to talk to

people. I didn't know how to defend myself. Everyone laughed at me and hated me. Maybe I was born meant to be so. Maybe I don't know how to talk and how to deal with problem, so maybe I make people angry even I don't mean to..

But, I'm still one human Bing..

I'm over here in Japan right now, but unfortunately, I don't like Japan so much. I always dreamed to go to U.S since I was in middle school. So, when I became U.S citizen, I was so happy. I'm dreaming to be able to go back to U.S someday.

It wasn't easy to write everything I want to say with my English writing skills. I tried my best. I hope I could explain everything. Thank you very much for reading. Thank you very much for your time also.

Sincerely,

Reina Lopez

EEOC Form 161 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Reina Lopez
 354 204 Shimoninaga SaijoCho
 Higashi Hiroshima Shi
 Hiroshima Ken 739-0023,

From: Chicago District Office
 500 West Madison St
 Suite 2000
 Chicago, IL 60661



*On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))*

EEOC Charge No.

EEOC Representative

Telephone No.

21B-2018-01719

Irma Quintero-Bueno,
 Investigator

(312) 869-8059

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission

Julianne Bowman

12-10-18

Enclosures(s)

Julianne Bowman,
 District Director

(Date Mailed)

cc:

WALGREEN
 Kim Metrick
 Director & Managing Counsel
 104 Wilmot Rd., MS#144W
 Deerfield, IL 60015

ILLINOIS DEPARTMENT OF
Human Rights

Pat Quinn, Governor
Rocco J. Claps, Director

May 9, 2018

Ms. Reina Lopez
354-204 Shimominaga Cho
Higashi, Hiroshima 739-0023

Charge No: 18M0411.03
Respondent: Walgreens

Dear Ms. Lopez:

Enclosed please find a formal statement of charge which is based on information the Department has received from you and which has been docketed as an unperfected charge and assigned the above charge number. If the charge has a letter "A" or "F" in it, we are also enclosing an important notice from the Federal Equal Employment Opportunity Commission because the charge has automatically filed your with the agency as well.

You must take the following steps for the Department to investigate your situation:

1. Sign the Original Charge.
2. Return the charge by this due date: May 31, 2018.

If the signed charge is not returned by the due date, the Department will assume that you do not wish to proceed with this matter and will recommend dismissal of your charge for failure to proceed. If you have any questions related to this matter, please contact me at (217) 785-5100.

Sincerely,
Intake Unit

IN8/ (3/10)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.		AGENCY <input type="checkbox"/> EEOC	CHARGE NUMBER 18M0411.03
Illinois Department of Human Rights and EEOC			
NAME (indicate Mr. Ms. Mrs.) REINA LOPEZ	HOME TELEPHONE (include area code) 011-81-82-426-0419		
STREET ADDRESS 354-204 SHIMOMINAGA SAIJO CHO HIGASHI HIROSHIMA 739-0023 JAPAN	CITY, STATE AND ZIP CODE	DATE OF BIRTH	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)			
NAME WALGREENS	NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE (Include area code) 217-356-8287	
STREET ADDRESS 841 BLOOMINGTON ROAD	CITY, STATE AND ZIP CODE CHAMPAIGN, ILLINOIS 61820	COUNTY CHAMPAIGN	
CAUSE OF DISCRIMINATION BASED ON: DISABILITY		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL) 09/11/2017	
<input type="checkbox"/> CONTINUING ACTION THE PARTICULARS ARE (if additional space is needed attach extra sheets) <p>I began my employment with Respondent in May 2016 as a Store Associate. In or around September 2017, I had a CT Scan performed, which required an injection. I believe the injection may have altered my behavior at work due to the side effects, which are referred to as Akathisia. On September 11, 2017, I was harassed by Respondent when Tommy (last name unknown), Store Manager, made a video which made fun of my behavior, said I was a criminal and a bad person then sent the video to the whole nation.</p> <p>I believe I believe I have been discriminated against because of my physical disability, Akathisia, in violation of the Americans with Disabilities Act of 1990.</p>			
		<hr/> X SIGNATURE OF COMPLAINANT DATE <hr/> <p>I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief</p>	